

United States District Court  
for the  
Western District of New York

United States of America

v.

Case No. 24-MJ-1113

LINIAN SONG

*Defendants*

CRIMINAL COMPLAINT

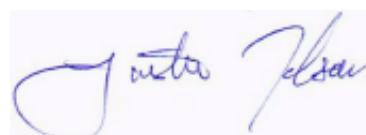
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

From on or about September 2023, the exact date being unknown, to the present, in the Western District of New York, and elsewhere, the defendant, **LINIAN SONG**, knowingly used a facility in interstate commerce, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of a business enterprise involving a prostitution offense in violation of the laws of the State in which they are committed.

**All in violation of Title 18, United States Code, Section 1952(a)(3) and 1952(b)(1).**

This Criminal Complaint is based on these facts:

Continued on the attached sheet.

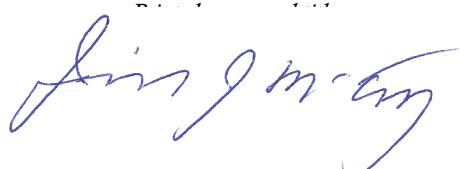


*Complainant's signature*  
JUSTIS W. NELSON  
SPECIAL AGENT  
FEDERAL BUREAU OF INVESTIGATION

Sworn to before me telephonically.

Date: April 22, 2024

City and State: Buffalo, New York



*Judge's signature*  
HON. JEREMIAH J. MCCARTHY  
UNITED STATES MAGISTRATE JUDGE  
*Printed name and title*

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR CRIMINAL COMPLAINT**

STATE OF NEW YORK )  
COUNTY OF ERIE ) SS:  
CITY OF BUFFALO )

I, **JUSTIS W. NELSON**, being duly sworn, deposes and says:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent of the Federal Bureau of Investigation (“FBI”) and entered on duty in September 2022. I am currently assigned to the Buffalo Field Office Child Exploitation and Human Trafficking Task Force (“CEHTTF”), which targets individuals involved in the sexual exploitation of children and adults as well as human trafficking offenders. As such, I am a law enforcement officer of the United States, within the meaning of Title 18, United States Code, Section 115(c)(1), who is “authorized by law or by Government agency to engage in or supervise the prevention, detention, investigation or prosecution of any violation of Federal criminal law.”

2. As a Special Agent, I attended the FBI Academy, which included twenty-one weeks of instruction, and is located in Quantico, Virginia. During this training, I received instruction regarding a wide variety of investigative techniques that are commonly used in support of the FBI’s investigative priorities. This training included instruction regarding the use of sources, electronic surveillance techniques, law enforcement tactics, search and seizure laws and techniques, physical surveillance, forensic techniques, and interviewing, among other topics. As a Special Agent assigned to the CEHTTF, I have participated in

investigations of persons suspected of violating federal child exploitation, child pornography, and human trafficking laws, including the drafting and execution of search and arrest warrants for these offenses. I have participated in multiple investigations in which criminals used computer, cellular telephone, and other mobile communication technology to communicate with their associates, confidential informants, cooperating individuals, and undercover officers. I have also participated in interviews of individuals that have been directly and indirectly involved in criminal activities. I work with experienced FBI Special Agents and Task Force Officers, and I have consulted with numerous law enforcement officers experienced in sex trafficking investigations. I have also participated in FBI mandated and voluntary training for these matters. Prior to my employment with the FBI, I was employed as a Police Officer with the Denver Police Department for approximately four years. In this role, I successfully executed arrest and search warrants for various violations of state law. As a result, I am familiar with how individuals engaged in criminal activities communicate with each other and generally conduct business. For example, I am aware that criminal agents discuss criminal matters over computer, cellular telephone, and other mobile communication technology and communicate vaguely or in coded language.

3. My investigative experience detailed herein, as well as the experience of other law enforcement officers who are participating in this investigation, and information gathered during this investigation, serve as the basis for the opinions and conclusions set forth herein. Additionally, the statements contained in this affidavit are based on my involvement in this investigation, my review of documents, video surveillance, and other records, as well as information provided to me by other law enforcement officers.

4. Your affiant states that this investigation is being conducted by FBI Buffalo with assistance from the Niagara County Sheriff's Office ("NCSO") and other law enforcement agencies. The statements contained in this affidavit are based upon my investigation and personal knowledge, my review of official documents and records, and information communicated to me by other law enforcement agents and government officials. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and an arrest warrant, I have not included each and every fact known to me concerning this investigation. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

5. As a result of working this investigation with other Special Agents and Task Force Officers, and investigators of the FBI, NCSO, and other law enforcement agencies, I am familiar with the circumstances of the offenses described in this affidavit. Because this affidavit is being submitted for a limited purpose, that is, a probable cause determination, I have not presented all of the facts of this investigation to date. I have set forth only the information I believe to be necessary to establish probable cause for the specified violations of federal law. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

6. I offer this affidavit in support of a criminal complaint charging **LINIAN SONG** (hereinafter, "**Song**") with violations of 18 U.S.C. § 1952(a)(3) and 1952(b)(1) [Interstate and Foreign Travel or Transportation in Aid of Racketeering Enterprises]. Based on my training and experience and the facts as set forth in this affidavit, there is probable

cause to believe that violations of 18 U.S.C. § 1952(a)(3) and 1952(b)(1) are being committed and have been committed by **Song**.

#### **APPLICABLE LAW**

7. Title 18, United States Code, Section 1952 makes it a federal offense for an individual to travel in interstate or foreign commerce, or use the mail or any facility interstate or foreign commerce with the intent to promote, manage, establish, or carry on, an unlawful activity, in this case, a business enterprise involving prostitution. 18 U.S.C. § 1952(a)(3) and 1952(b)(1) [Interstate and Foreign Travel or Transportation in Aid of Racketeering Enterprises (“ITAR”)].

#### **ILLICIT MASSAGE BUSINESSES**

8. Based on my training, experience, and communications with other law enforcement officers familiar with sex and labor trafficking, money laundering, visa fraud, ITAR, and related crimes, I know the following:

- a. Illicit massage businesses (“IMBs”) often operate out of storefronts, apartments, or retail spaces under the guise of providing therapeutic massages. While IMB owners are rarely involved in the day-to-day operation of spas, they often maintain merchant services and other bank accounts on behalf of the businesses. Owners use these accounts to pay spa bills and manage the large cashflow generated by the IMB industry. Onsite managers often control the daily activities of the spa, including interacting with customers, managing employees, and collecting house fees for “massage” services. Spa workers often provide sexual services to customers in exchange for a pre-negotiated cash “tip” paid directly to the worker. Workers may rotate between spa locations every few weeks to maintain customer interest and avoid law enforcement detection. It is common for women to cross state lines as they move between IMBs.

- b. The IMB industry generates significant cashflow. As spa workers typically service multiple clients each day, and spas operate seven days a week, it is common for IMBs to generate millions of dollars each year. Spa managers and owners routinely transfer money between personal and business accounts in different financial institutions to promote the business and conceal the origins of illicit proceeds. Specifically, managers use illicit funds to transport the women performing commercial sex acts between spas, pay bills, and purchase advertisements promoting the businesses.
- c. IMB owners and managers use many of the same communication techniques utilized by legitimate businesses, including coordinating and communication through email, cell phone calls, text messages, and international mobile communication applications (“apps”). I know based on my training and experience that individuals involved in IMBs maintain email communications and account information, cell phones, computers and other electronic media in the same way a legitimate business maintain such material as tools of the trade.
- d. There are many signs that illegal activity may be occurring at a massage business; for example, primarily female employees, employees living at the business, employees who arrive and leave work with the owner or manager, and advertising phone numbers and locations on websites, such as Backpage.com, Skipthegames.com, and other Backpage-type websites.<sup>1</sup> Advertisements and postings on Backpage.com and related websites often offer “massages” and other coded language rather than explicitly advertising sexual services. The advertisements often include provocative photographs of women in lingerie posed in sexually suggestive positions. The text of posts often includes descriptions of the “masseuse,” including age, height, weight, ethnicity, and other descriptions of physical appearance. Not one of these signs alone can accurately identify an IMB. Yet, a combination of these factors, and additional factors, raises the likelihood that an IMB is present. In sum, I know based on my training, experience, and conversations with other law enforcement officers that online posts by IMBs advertise commercial sex, rather than legitimate massage services.
- e. These criminal enterprises are sophisticated and usually consist of recruiters, customers, transporters, managers, owners, bosses, and

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<sup>1</sup> Backpage-type websites are online platforms or websites that advertise erotic massages and other sexual services in exchange for money. Backpage.com was an online classified website used to advertise escort and prostitution services, including business associated with the illicit massage industry. On April 6, 2018, the United States federal government seized and shut down Backpage.com and affiliated websites due to their promotion of sex trafficking and prostitution. Since the seizure of Backpage.com, IMBs advertise on a variety of other online platforms and websites, such as Skipthegames.com, and print publications. To be specific, the Internet is considered an interstate facility due to its ability connect people all across the world.

actors unknown. There are often actors located in foreign countries. They orchestrate the training and education of involved parties and develop different levels of security to evade law enforcement detection. IMBs are spread throughout the United States, and their main objective is to benefit financially through their illicit activity.

### **PROBABLE CAUSE**

### **BACKGROUND OF INVESTIGATION**

9. The FBI with the assistance of other law enforcement agencies is investigating a business known as and operating under the name **New Elegant Shiatsu**, located at 5714 S Transit Road, Lockport, New York 14094 (hereinafter, “**New Elegant Shiatsu**”). Based on the information developed in the investigation and detailed herein, it is believed that **New Elegant Shiatsu** is operating as an IMB, that **Song** is the owner and spa manager of **New Elegant Shiatsu**, and that prostitution and commercial sex acts have occurred and are occurring at **New Elegant Shiatsu**. Based on the information developed in the investigation, it is believed that **New Elegant Shiatsu** is connected or associated with the business known as and operating under the name **S Wellness Spa**, located at 985A S Clinton Avenue, Rochester, New York 14620 (hereinafter “**S Wellness Spa**”).

10. Through the ongoing investigation, investigators have learned that **Song**<sup>2</sup> used and uses the mail or an interstate facility or foreign commerce with the intent to promote, manage, establish, or carry on, an unlawful activity, in this case, a business enterprise

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<sup>2</sup> Your affiant has obtained and reviewed records from Washington County Sheriff’s Office, in the State of Minnesota, that identified **Song** as a subject arrested for prostitution in Minnesota. This detailed report describes, among other things, that **Song** as having been employed with a job performing commercial sex acts at a spa located in Houston, Texas, and then in Minnesota. A portion of the cash **Song** earned by performing commercial sex acts were picked up by her employer’s boyfriend.

involving prostitution, in violation of 18 U.S.C. § 1952(a)(3) and 1952(b)(1). In furtherance of this activity, the investigation has learned that **Song** utilizes a black 2020 Toyota RAV4, bearing New York license plate [REDACTED] registered to **Song** at an address of [REDACTED] [REDACTED] (hereinafter “Toyota RAV4”) and utilizes the telephone, among other facilities of interstate commerce, in furtherance of IMB-related activities.

### INITIAL INVESTIGATION

11. On or about October 20, 2023, NCSO notified the FBI of an investigation regarding **New Elegant Shiatsu**. NCSO stated that online postings advertising sexual and/or massage services associated with **New Elegant Shiatsu** had been posted on Backpage-type websites, in particular Skipthegames.com, Eccie.net, and Rubsguide.com. I know based on my training and experience as well as publicly available information that Skipthegames.com is an escort website with postings advertising commercial sexual activity or sexual services offered in a particular area in exchange for money; Eccie.net is an escort website that enables customers to review their sexual experiences in forums; and Rubsguide.com is an escort website, similar to Skipthegames.com, that states that they focus on escorts and the massage industry in the United States.

12. On or about October 17, 2023, NCSO conducted multiple traffic stops on individuals observed departing **New Elegant Shiatsu**. As described below, upon being interviewed, the individuals indicated they received sexual services from two different adult female masseuses in exchange for cash at **New Elegant Shiatsu**.

13. On or about October 20, 2023, I requested information from Skipthegames.com pertaining to online postings associated with **New Elegant Shiatsu**. On or about October 21, 2023, I received a return that included the following subscriber information:

Email: [REDACTED]@163.com
Sign up: June 09, 2018
Phone number: [REDACTED] 6321

The image below is a representative depiction of advertisements observed posted for **New Elegant Shiatsu** on Skipthegames.com. The below image was observed posted to Skipthegames.com on or about December 17, 2023.

SKITTHEGAMES.EU • NEW YORK • BUFFALO • MASSAGE OR MASSAGE STUDIO • GRAND OPENING

Grand Opening 3470 New Elegant Shiatsu

36 years old

00:00 PM on 2023-12-17

Read before contacting a poster

Get Delay Gel + Premium Condoms here

716-515-2470 716-515-2470 716-515-2470 716-515-2470 716-515-2470

716-515-2470

I see	Men
Race / Regionality	Asian
Accepted payment methods	Cash
Available for	Incall
Hours	9 am to 10 pm
Location	5714 S Transit Rd, Lockport, NY
Address	5714 S Transit Rd, Lockport, NY
Online Slots & Casino	Play Live Blackjack, Slots and more

New Lovely ladies

The massage technique is very good, which can effectively help you relieve stress and fatigue.

The perfect encounter between sweet smiling service and high-quality massage techniques.

This is very suitable for gentlemen who want to get a satisfying relaxation

If you have been looking for an Asian massage center that will surprise you.

Don't hesitate anymore, it's here, clean rooms and comfortable environment are all available

While enjoying the massage, the beautiful ladies will make you forget all your worries.

Welcome to call us, we support Walk-Ins  
**Massage ,Cupping ,Couples massage,Best Service**

Call: 3470

Open 7 Days 9:00AM-9:30PM

Address: 5714 S Transit Rd, Lockport, NY 14094

14. Through open-source searches, law enforcement determined that **Song** is listed as the filer and chief executive officer for **New Elegant Shiatsu**. During physical surveillance conducted throughout this investigation, NCSO observed **Song** as the primary employee operating at **New Elegant Shiatsu**.

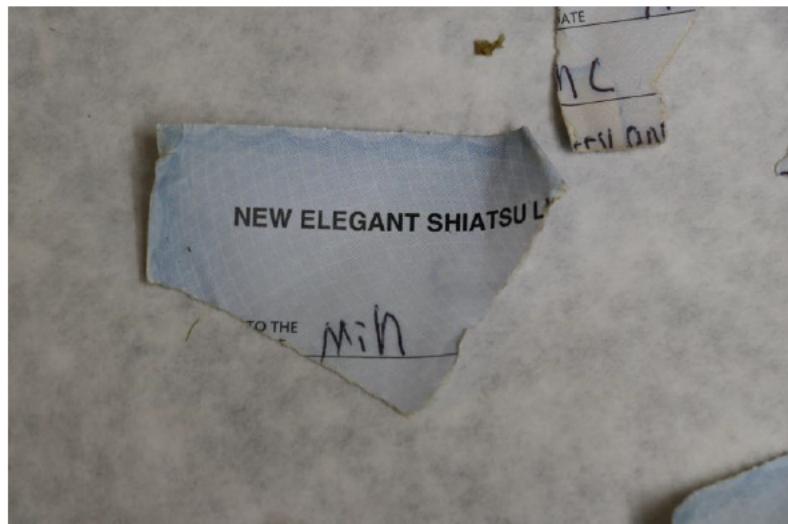
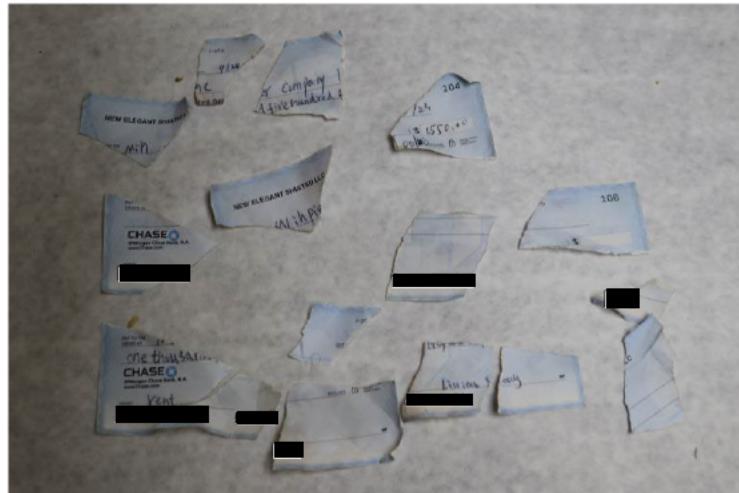
## NCSO INVESTIGATION

15. On or about December 17, 2023, I received a summary of NCSO's investigation related to **New Elegant Shiatsu**.<sup>3</sup> The summary included the following, among other information:

- A. On or about September 22, 2023, NCSO received a complaint, that the workers at the business located at **New Elegant Shiatsu**, with a phone number of [REDACTED] 3470, later identified as **New Elegant Shiatsu**, were performing acts of prostitution.
- B. On or about September 25, 2023, an open-source search of the business' phone number [REDACTED] 3470 and the business name, **New Elegant Shiatsu**, was conducted. The search revealed that both were linked to numerous websites, including skipthegames.com; www.eccie.net; Rubsguide.com; www.168worker.com. These websites appeared to be sexual in nature and promoted sexual acts.
- C. On or about September 25, 2023, at approximately 8:00 p.m., NCSO Investigators observed the business was open, with all interior lights on, and an Asian female, approximately 40-50 years old, dark hair, medium build, was inside of the business. At approximately 8:54 p.m., the same female was observed locking the front door of the business and turning all the interior lights off. At approximately 9:00 p.m., Toyota RAV4 was observed driving around the building and parking in the parking lot designated for Home Depot, located in the rear of the lot, near a dumpster for another business. NCSO Investigators observed the same Asian female, who also matched **Song**'s description exit the Toyota RAV4, throw two small garbage bags in a waist high dumpster. The female then locked the Toyota RAV4 and returned to **New Elegant Shiatsu**, entered and locked the door behind her. NCSO Investigators remained on location and secured the two garbage bags from the waist high dumpster. NCSO Crime Scene Investigation Unit later processed the garbage bags and entered two items of evidentiary value into evidence, including one Chase Bank check from **New Elegant Shiatsu LLC**, signed by **Song**, a prescription pill bottle with a label belonging to **Song**, and several massage pamphlets. Photographs of a check recovered from the garbage bags depict a torn pieces of a check for \$1,550.00 made out by **Song**, the owner of **New Elegant Shiatsu LLC**, for rent:

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<sup>3</sup> On or about December 16, 2023, NCSO patrol deputies responded to a call for service at New Elegant Shiatsu and encountered the defendant and a spa employee. During their interactions, both the defendant and spa employee spoke in English and Mandarin; the defendant reported to deputies, among other things, that the spa employee was secretly providing more services to customers and she requested the employee to leave.



- D. On or about October 3, 2023, the New York State Education Department confirmed to NCSO Investigators that there is no record or license for **Song** to practice massage therapy in New York State.
- E. On or about October 17, 2023, NCSO Investigators conducted surveillance of **New Elegant Shiatsu** and conducted several interviews of customers after they departed from **New Elegant Shiatsu**. Multiple customers indicated to NCSO Investigators that each paid cash for a massage, and at the end of the massage, the spa employee performed a sexual act on the customer.
- F. On or about October 19, 2023, NCSO Investigators conducted surveillance of **New Elegant Shiatsu** and conducted an interview of a customer after he departed from **New Elegant Shiatsu**. The customers indicated to NCSO Investigators that he paid cash for a massage, and at the end of the massage, the spa employee performed a sexual act on the

customer.

#### **ADDITIONAL INFORMATION**

16. As a part of the investigation, law enforcement utilized Court authorized electronic location monitoring of **Song's** Toyota RAV4 beginning on or about December 20, 2023.

17. On or about December 22, 2023, a grand jury subpoena was sent to JP Morgan Chase for financial records associated with **Song** and **S Wellness Spa**. On or about February 5, 2023, JP Morgan Chase provided records that indicate **Song** was the previous owner of **S Wellness Spa** under the name **S Wellness Spa Inc.** from on or about July 15, 2022, to on or about March 3, 2023. **Song** was listed as the sole signer for the account for **S Wellness Spa** during this period.

18. Throughout the electronic location monitoring period, between on or about March 2024, and through on or about April 2024, **Song's** Toyota RAV4 has traveled to the vicinity of **S Wellness Spa** approximately 8 times – with the last known date of travel being on or about April 15, 2024. Frequently, the electronic location monitoring indicated that after departing the vicinity of **S Wellness Spa**, **Song's** Toyota RAV4 would return to the vicinity of **New Elegant Shiatsu**.

19. On or about April 4, 2024, NCSO notified your affiant that **Song** and a new female arrived at **New Elegant Shiatsu**. Upon reviewing the electronic location monitoring, it was determined that **Song's** Toyota RAV4 had traveled from the vicinity of **New Elegant Shiatsu** to the vicinity of **S Wellness Spa** and back to **New Elegant Shiatsu**.

20. Based on the information gathered during the investigation, including but not limited to interviews, surveillance, and the electronic location monitoring information for **Song**'s Toyota RAV4, **Song** is believed to use her Toyota RAV4 to transport employees and other items to be used in furtherance of IMB-related activities being conducted at **New Elegant Shiatsu, S Wellness Spa**, and to and from other locations known and unknown. As described below, **Song** also appears to be allowing **New Elegant Shiatsu**'s employees to use **Song**'s Toyota RAV4.

#### PHONE ANALYSIS

21. Through investigation, law enforcement identified the phone numbers associated with **Song**, **New Elegant Shiatsu**, **S Wellness Spa**, and other individuals identified through investigation as associated with the spas. Each phone number listed below has multiple online advertisements posted to Backpage-type websites associated with it. The advertisements associated with these phone numbers reference sexual services or coded language that I know based upon my training and experience to be associated with sex acts offered at each location and instruct customers to call the phone number listed. Each location also has customer reviews posted to review websites such as Rubmaps.com that describe the commercial sex acts performed at the locations. A representative advertisement is below:

PHONE NUMBER	ASSOCIATED WITH
7889	Linian Song, S Wellness Spa, [REDACTED]

[REDACTED] 3470 (captioned in paragraph 13)	<b>Linian Song, New Elegant Shiatsu</b>
[REDACTED] -9745 (captioned below)	<b>Linian Song, S Wellness Spa, [REDACTED]</b>

22. On or about January 5, 2024, a grand jury subpoena was served to T-Mobile US, Inc. (hereinafter, "T-Mobile") for call detail records associated with multiple phone numbers, including [REDACTED] 7889, identified through investigation as associated with **Song**, for the period on or about September 1, 2023, through on or about December 28, 2023. On or about January 12, 2024, T-Mobile responded with the requested information. Analysis of call detail records indicated that **Song**'s 7889 phone number was in contact with **S Wellness**

**Spa's** 9745 phone number approximately 45 times. During this period, **Song's** 7889 phone number was also in contact with **Song's New Elegant Shiatsu's** 3470 phone number approximately eight times.

23. Based upon analysis of call detail records, Backpage-type website advertisements, and online reviews, it is believed that **Song** is utilizing phone numbers identified through investigation to advertise and coordinate the IMB-related activities of **New Elegant Shiatsu** and **S Wellness Spa**.

## **SURVEILLANCE**

24. On or about December 28, 2023, at approximately 11:18 a.m., the electronic location monitoring data revealed that **Song's** Toyota RAV4 stopped at Buffalo Niagara International Airport ("BNIA"). Video surveillance from BNIA revealed that **Song's** Toyota RAV4 stopped and picked up an unidentified female (hereinafter, "UF1") at approximately 11:20 a.m., and then departed. **Song** appeared to be driving the Toyota RAV4, which travelled to and briefly stopped in the vicinity of Chase Bank, located at 8160 Transit Road, Amherst, New York. **Song's** Toyota RAV4 then travelled to **New Elegant Shiatsu**. Video surveillance of **New Elegant Shiatsu** captured **Song** escorting UF1, carrying luggage, into **New Elegant Shiatsu**. UF1 was last observed being transported by **Song** on or about January 7, 2024.

25. On or about January 5, 2024, at approximately 10:27 p.m., **Song** was observed on video surveillance unloading and escorting another unidentified female (hereinafter,

“UF2”) from **Song**’s Toyota RAV4 into **New Elegant Shiatsu**. UF2 was seen carrying luggage into the spa. UF2 was last seen being transported in **Song**’s Toyota RAV4 by **Song** on or about January 14, 2024, at approximately 9:46 p.m.

26. On or about January 14, 2024, at approximately 1:40 a.m., **Song** was observed on video surveillance unloading and escorting an unidentified female (hereinafter, “UF3”) from **Song**’s Toyota RAV4 into **New Elegant Shiatsu**. UF3 was seen carrying luggage into the spa.

27. On or about January 27, 2024, at approximately 4:30 p.m., **Song** was observed on video surveillance unloading and escorting [REDACTED] (hereinafter, “Employee 1”), whose identity was previously unknown to law enforcement at the time of her arrival to **New Elegant Shiatsu**, from **Song**’s Toyota RAV4 to **New Elegant Shiatsu**. On the day of Employee 1’s arrival, the electronic location monitoring shows that **Song** and **Song**’s Toyota RAV4 travelled from the vicinity of 49-30 202<sup>nd</sup> Street, Bayside (Queens), New York, and departed the Queens, New York area, at approximately 9:34 a.m. that day.

28. On or about February 20, 2024, at approximately 1:07 a.m., **Song** was observed on video surveillance unloading and escorting [REDACTED] (hereinafter, “Employee 2”), whose identity was previously unknown to law enforcement at the time of her arrival to **New Elegant Shiatsu**, from **Song**’s Toyota RAV4 to **New Elegant Shiatsu**. The day of Employee 2’s arrival, the electronic location monitoring shows that **Song** and **Song**’s Toyota RAV4 travelled from the vicinity of Ocean Travel Inc., located at 809B Millersport Highway, Buffalo, New York, and left at approximately 11:57 a.m. on that day. On or about February

22, 2024, NCSO conducted a traffic stop on **Song**'s Toyota RAV4, which was being driven by Employee 2. Employee 2 provided NCSO a driver license issued by the People's Republic of China. Employee 1 was identified as the passenger of the vehicle; however, she could not provide any form of identification. **Song** was not an occupant of the vehicle.

29. Immigration and law enforcement database checks revealed that Employee 1 and Employee 2 are both citizens of the Republic of China. Based upon immigration and law enforcement database checks, it appears that Employee 2 entered the United States illegally through Mexico on or about December 24, 2023, and Employee 1 entered illegally through Mexico on or about August 25, 2023. According to law enforcement records, both individuals were encountered in San Diego, California by United States Border Patrol ("USBP") agents at locations not designated as an official port of entry. Both individuals were issued notices to appear to court for unlawful entry into the United States. Employee 1 and Employee 2 both provided USBP with 13315 Blossom Avenue, Flushing, New York as a contact address. Employee 2 provided her phone number to be contacted at as [REDACTED] 7889. Employee 1 provided her phone number to be contacted at as [REDACTED] 9745. Through law enforcement database checks, both the phone numbers and the address provided have been identified as contact information associated with **Song**.

30. Through investigation, law enforcement has determined that **Song** owns and operates **New Elegant Shiatsu**; that **Song** pays for rent at **New Elegant Shiatsu** through checks from **New Elegant Shiatsu**'s business account controlled by **Song** and sent through the mail, which is a facility of interstate commerce. Through investigation, the funds held and deposited into **New Elegant Shiatsu**'s business account are believed to be illicit funds

deprived from prostitution, in particular commercial sex acts occurring at **New Elegant Shiatsu**, in violation of 18 U.S.C. § 1952(a)(3) and 1952(b)(1).

31. Through investigation, law enforcement has determined that **New Elegant Shiatsu** and **S Wellness Spa** are advertised on Backpage-type websites, specifically Skipthegames.com and other websites, listing phone numbers associated with **Song**. Law enforcement has determined that these advertisements encourage viewers to contact phone numbers associated with **Song** to obtain sexual services in violation of 18 U.S.C. § 1952(a)(3) and 1952(b)(1). The use of the Internet and telephonic communications are both facilities of interstate commerce.

32. Through investigation, law enforcement also determined that **Song's** Toyota RAV4 was manufactured by Toyota Motor Manufacturing, Canada, Inc. in Cambridge, Ontario, Canada.<sup>4</sup> **Song** utilizes this vehicle in furtherance of IMB-related activities, such as the management of **New Elegant Shiatsu**, including the transportation of spa employees between **New Elegant Shiatsu**, **S Wellness Spa**, and other locations, who are believed to be engaging in commercial sex acts at **New Elegant Shiatsu** and **S Wellness Spa**.

### **CONCLUSION**

33. WHEREFORE, based on the aforementioned facts and circumstances presented in this affidavit, I respectfully submit that there is probable cause to believe **LINIAN SONG** violated 18 U.S.C. § 1952(a)(3) and (b)(1) [Interstate and Foreign Travel or

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<sup>4</sup> Vehicle manufacturing information was located at [vpic.nhtsa.dot.gov/decoder/](http://vpic.nhtsa.dot.gov/decoder/) and based on VIN [REDACTED] known to be associated with Song's Toyota RAV4.

Transportation in Aid of Racketeering Enterprises]. I respectfully request the Court issue the attached criminal complaint and arrest warrant for **LINIAN SONG**. I further request that the Court seal the requested criminal complaint, this affidavit, and the requested warrant until such time as the warrant has been effectuated.



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JUSTIS W. NELSON  
Special Agent  
Federal Bureau of Investigation

Sworn to and signed telephonically on  
this 22nd day of April, 2024.



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HONORABLE JEREMIAH J. MCCARTHY  
UNITED STATES MAGISTRATE JUDGE